



JE2	Lippert/Local Labs Receipt	44-2 filed 6/24/22
JE3	VRF December 16, 2021 Press Release	44-13 filed 6/24/22
JE4	VRF December 14, 2021 Email to SOS	44-14 filed 6/24/22
JE5	SOS Criminal Referral of VRF to AG	44-3 filed 6/24/22
JE6	Trujillo Email Transmitting Referral Letter to FBI	44-23 filed 6/24/22
JE7	ProPublica Article	44-4 filed 6/24/22
JE8	Communications between A. Curtas and M. O'Matz	44-19, 44-20 filed 6/24/22
JE9	VRF February 15, 2022 Voter Data Request and Responses Thereto	44-16 filed 6/24/22
JE10	Email(s) with California Secretary of State and AG	44-24, 44-25, 44-26 filed 6/24/22
JE11	Email(s) with Washington AG	119-9 filed 4/14/23
JE12	SOS's Tweets Regarding VRF	32-5 filed 5/17/22
JE13	SOS's Facebook Posts Regarding VRF	32-6 filed 5/17/22
JE14	SOS Press Release	32-7 filed 5/17/22
JE15	February 14, 2022 Voter Information Authorization Form	44-10 filed 6/24/22
JE16	Undated Voter Information Authorization Form	44-8 filed 6/24/22
JE17	February 10, 2022 Voter Information Authorization Form	44-9 filed 6/24/22

JE18	May 27, 2022 NVRA Notice & Request for Records	44-22 filed 6/24/22
JE19	June 16, 2022 Response from C. Lang to VRF re: NVRA Notice & Request for Records	119-11 filed 4/14/23
JE20	VRF October 18, 2022 Request for Records and SOS November 17, 2022 Response Denying Request	119-14 filed 4/14/23
JE21	List of Requestors of Voter Data	44-11 filed 6/24/22
JE22	Documents Received from Aristotle Subpoena	124-2 filed under seal 5/5/23
JE23	House Bill 4	-
JE24	AG Responses to VRF First Discovery	-
JE25	SOS Responses to VRF First Discovery	-
JE26	AG Responses to VRF Second Discovery	-
JE27	SOS Responses to VRF Second Discovery	-
JE28	AG Responses to VRF Third Discovery	-
JE29	SOS Responses to VRF Third Discovery	-
JE30	AG First Supplemental Responses to VRF First Discovery	-
JE31	AG First Supplemental Responses to VRF Second Discovery	-
JE32	AG First Supplemental Responses to VRF Third Discovery	-

JE33	Email from E. Lecocq Supplementing Discovery Responses	119-16 filed 4/14/23
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## II. Plaintiff's Exhibits

2. In addition to the Joint Exhibits above to which the parties have stipulated, Plaintiff intends to introduce and rely upon the following exhibits:

Plaintiff's Exhibit #	Description	Docket # (if previously filed)
1	VRF 06-16- 2023 IPRA Request to NM SOS re: NVRA Requests and Materials	-
2	NM SOS 06-22-2023 Initial Response to VRF 06-16-2023 IPRA Request to NM SOS re: NVRA Requests and Materials	-
3	NM SOS 06-30-2023 First Production of Documents in Response to VRF 06-16- 2023 IPRA Request to NM SOS re: NVRA Requests and Materials	-
4	NM SOS 08-16-2023 Status Report to VRF 06-16- 2023 IPRA Request to NM SOS re: NVRA Requests and Materials	-
5	NM SOS 08-22-2023 Supplemental Production of Documents in Response to VRF 06-16- 2023 IPRA Request to NM SOS re: NVRA Requests and Materials	-
6	VRF 06-16- 2023 IPRA Request to NM SOS re: NVRA Requests and Materials	-

Defendants reserve the right to argue the admissibility and weight of Plaintiff's exhibits.

### III. Defendants' Exhibits

In addition to the Joint Exhibits above to which the parties have stipulated, Defendants intend to introduce and rely upon the following exhibits:

Defendants' Exhibit	Description	Docket # (if previously filed)
A	"Complaint" communications received by VRF regarding the publication of voter data (VRF_1_00310 through 000427 and VRF_2_000468 through 517)	-
B	Complaints received by the SOS's Office regarding the publication of voter data	-

Plaintiff preserves its objection that Defendants' exhibits constitute hearsay or hearsay within hearsay.

Respectfully submitted this 29th day of August, 2023.

**GRAVES GARRETT, LLC**

/s/ Edward D. Greim

Edward D. Greim

Missouri Bar No. 54034

*Admitted Pro Hac Vice*

GRAVES GARRETT LLC

1100 Main Street, Suite 2700

Kansas City, Missouri 64105

Tel.: (816) 256-3181

Fax: (816) 222-0534

edgreim@gravesgarrett.com

**HARRISON, HART & DAVIS, LLC**

Carter B. Harrison IV

924 Park Avenue SW, Suite E

Albuquerque, NM 87102

Tel: (505) 369-6599

Fax: (505) 341-9340

carter@harrisonhartlaw.com

*Counsel for Plaintiffs*

/s/ Mark W. Allen

Mark W. Allen

Jeff Dan Herrera

Assiostant Attorneys General

Office of the New Mexico Attorney General

408 Galisteo St.

Santa Fe, NM 87501

Tel.: (505) 490-4060

Fax: (505) 490-4881

mallen@nmag.gov

jherrera@nmag.gov

*Counsel for Defendants*

**CERTIFICATE OF SERVICE**

I, Edward D. Greim, certify that on August 29, 2023, a copy of foregoing was filed with the Clerk of the Court using the CM/ECF system, which sent notification to the following via email:

Jeff D. Herrera

Mark Allen

jherrera@nmag.gov

mallen@nmag.gov

Office of the New Mexico Attorney

General 408 Galisteo Street

Santa Fe, NM 87501

/s/ Edward D. Greim

Edward D. Greim

Counsel for Plaintiff